

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSIONER ANDERSON  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL

**FROM:** MATT HUNTER  
DEPUTY ATTORNEY GENERAL

**DATE:** MARCH 26, 2021

**SUBJECT:** IN THE MATTER OF CENTURYLINK COMMUNICATIONS, LLC'S  
APPLICATION FOR DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER; CASE NO. QCC-T-21-01.

On March 12, 2021, CenturyLink Communications, LLC (“Company”) applied for designation as an Eligible Telecommunications Carrier (“ETC”) in Idaho.

### THE APPLICATION

The Company’s ultimate parent company, Lumen Technologies, Inc., was a winning bidder in the Rural Digital Opportunity Fund (“RDOF”) auction to provide voice and broadband services in select Idaho census blocks. Application at 1. The Company states that Lumen Technologies, Inc. assigned Qwest Corporation (the Company’s parent) the RDOF support for winning bids in the state of Idaho. *Id.* at 4. While Qwest Corporation’s affiliates are already designated by the Commission as ETCs for most of the awarded census blocks, 161 census blocks (“Incremental CBs”) fall outside the authorized service areas of Qwest Corporation’s affiliates. *Id.* at 2. The Company is a Commission-certified telephone corporation in the Incremental CBs but is not designated as ETC in these areas. *Id.* The Company therefore seeks ETC designation in the Incremental CBs. *Id.*

The Company asserts it meets all federal and state requirements for designation as an ETC and argues that designating the Company as an ETC is in the public interest. *Id.* at 4-7. The Company asks that the Commission grant it ETC status by June 1, 2021. *Id.* at 7.

**STAFF RECOMMENDATION**

Staff recommends the Commission issue a Notice of Application and Notice of Modified Procedure, setting an April 26, 2021 comment deadline and a May 3, 2021 reply comment deadline.

**COMMISSION DECISION**

Does the Commission wish to issue a Notice of Application and Notice of Modified Procedure, setting an April 26, 2021 comment deadline and a May 3, 2021 reply comment deadline?

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Matt Hunter  
Deputy Attorney General

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